

Illinois Commerce Commission
Pipeline Safety
Field Trip Report

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Exit Meeting Contact: (Not Applicable)	Total Man Days: 0
Pipeline Safety Representative(s): Matt Smith	
Company Representative to Receive Report: Michael Fuller Company Representative's Email Address: mfuller2@ameren.com	<u>Emailed Date:</u> 10/2/2013

Inspection Summary

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Compliance Follow-Up	ICC Office	Matt Smith	Alton	0	9/30/2013	

Statement of Activities

Staff received a response letter from Ameren Illinois Company regarding a NOA issued to Ameren for inadequate procedures regarding leak investigation. The letter was reviewed to determine if the modified procedures met the requirements of 49 C.F.R. Part 192.605 (a).

Ameren responded to NOA 2013-A001-00128 by adding a procedure to the Ameren O&M Leak Management Section 2.04, Subsection 13. A .1. The added procedure requires an Ameren employee to bar hole toward gas facilities once a leak has been repaired to determine if there is a potential leak in the vicinity of the repair. Further in the same procedure, 13. A. 4., the procedure requires if residual gas is detected, then the reading must be documented. The term residual gas can be confusing because there is not a leak detection instrument on the market that reads in residual gas. It is not possible for an employee to determine the gas is residual or another leak. This requires an employee to make an assumption that may be incorrect and can have detrimental consequences if the leak is not properly addressed.

Ameren's revised procedure does not adequately state actions to be taken by an Ameren employee if gas is detected. The procedure appears to only require an employee to document the reading. Ameren's response to NOA 2013-A001-00128 is not adequate. The procedure must better define and clarify the steps to be taken if gas is detected in an area where a leak repair was conducted. Staff is concerned the procedure provided as a response in this matter was vague and may not be understood by field personnel or field supervision. Therefore, Staff recommends that once Ameren has modified the procedure to better define the actions to be taken by field personnel when gas is detected near a repaired leak, that the procedure is tested by employees that may be required to follow the procedure to determine the procedure is understandable. Once this process has been completed, then the new procedure must be provided to Staff for review no later than November 30, 2013.

Ameren responded to NOA 2013-A002-00128 by adding a procedure to the Ameren O&M Leak Management Section 2.04, Subsection 12. The procedure requires a leak be expedited for repair once the third leak call has been received within a year. The procedure further requires Ameren personnel to run monthly reports to determine if multiple leak calls have been reported for an address.

The modified procedure is adequate, except for the term "an address." Ameren uses this term to state only when the third leak call is reported within one year at an address where further actions will be required to repair the leak. A gas leak may be reported by using general terms, such as northeast corner of an intersection. A gas leak may be reported at an address because the wind has carried the odor to that address. The actual leak may be several addresses away or even several blocks away. By stating a leak repair will be expedited only after the third leak at an address does not account for leaks that may be reported around the address. Staff is concerned that Ameren will not take adequate actions due to the procedure specifically reviewing an address instead of a general area. A revised procedure is required no later than November 30, 2013.

ISSUE(S) FOUND:

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NO ISSUES FOUND.

ISSUE(S) CORRECTED:

NO ISSUES CORRECTED.

NOTICE OF AMENDMENT(S) FOUND:

NO NOAs FOUND.

NOA(S) CORRECTED:

NO NOAs CORRECTED.

NOTICE OF PROBABLE VIOLATION(S) FOUND:

NO NOPVs FOUND.

NOPV(S) CORRECTED:

NO NOPVs CORRECTED.